## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY



OREGON OPERATIONS OFFICE
811 & W. 6TH AVENUE
EXECUTIVE BUILDING, 3RD FLOOR
PORTLAND, OREGON 97204
May 30, 1989

REPLY TO 000

Mr. Roger Holcomb, Energy Superintendent Warm Springs Forest Products Ind. Highway 26 Warm Springs, Oregon 97761

Dear Mr. Holcomb:

Thank you for verifying that the 1986 notification data on the age of your 10,000 gallon diesel tank was correct. As I mentioned in our 5/30 telephone conversation, I will change the 15 year age reported on the 2/23/89 notification form to 30 years, as reported on the 5/5/86 form. We will also add a 10-year old, 500 gallon tank, not presently in use.

As you are aware, there is a leak detection compliance deadline coming up for tanks that are 25 years or older. Thus, your 10,000 gallon tank falls into this category and must have some form of leak detection in use by December 22, 1989. This can be as simple as supplementing your current daily inventory efforts with an annual tank tightness test, or as complex as a groundwater monitoring system. Obviously, if the tank is removed prior to December 22, no further leak detection efforts are required. [As I pointed out, care should be used when tightness testing old steel tanks. The tightness testing process has been known to loosen 'rust plugs' and a leak can result where formerly there was no problem.]

Regarding taking your tanks out of service, there are 'good removal' practices that can assure that contamination is not left at the site. These practices are described in the enclosed summary document, "Musts for USTs" and in the enclosed copy of the technical regulations. Additional information on tank removal can be obtained from the technical practices referenced in the regulations (see section 280.71 for a list of those recommended industry practices). Both the 500 and 10,000 gallon tanks must be taken out of service in a manner consistent with those industry practices.

I hope that this information is of use. Feel free to call me at (503) 326-6363 if you have questions regarding the regulations, or other tank-related issues.

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Christopher C. Wohlers UST/LUST Program Coordinator

Enclosures